

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

ROBINA JENKINS,

Plaintiff,

v.

CASE NO.: 2.05 CV 1049-C

**NANCY WORLEY, individually
and in her capacity as SECRETARY
OF STATE, State of Alabama, et. al.,**

Defendants.

MOTION FOR LEAVE TO AMEND COMPLAINT

Comes now, Plaintiff, pursuant to Rule 15 of the Federal Rules of Civil Procedure, and move the court to amend Plaintiff's complaint as follows:

COUNT V

34. Plaintiff adopts and realleges herein paragraphs one through nine (1-9) and twenty-eight through thirty (28-30) as if said paragraphs are fully set forth herewith.

35. The failure of Defendant Board to conduct a fact-finding hearing violated Plaintiff's right to due process of law under the Merit System Act.

36. The failure of Defendant Board to conduct a fact-finding hearing deprived Plaintiff of due process guarantees and of her property interest in her job.

WHEREFORE, the above premises considered, Plaintiff requests compensatory damages in the sum of six hundred thousand dollars (\$600,000.00) and punitive damages in the sum of one million dollars (\$1,000,000.00), individually and severally against the

State Personnel Board.

Respectfully submitted

/s/James E. Wilson, Jr.

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CERTIFICATE OF SERVICE

I hereby certify I have served a copy of the foregoing upon the following by
placing a copy in the United States Mail, postage prepaid this _____ day of August, 2007.

Alice A. Byrne, Esq.
State Personnel Department
64 North Union Street
Room 316
Montgomery, Alabama 36130

/s/James E. Wilson, Jr.